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*The nation's most influential advocacy organization  
protecting children against sex, violence and profanity in entertainment*

June 19, 2018

BY ELECTRONIC FILING

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: Applications of Tribune Media Company and Sinclair Broadcasting Group, Inc. for Consent to Transfer Control of Licenses and Authorizations, MB Docket No. 17-179

Dear Ms. Dortch:

On behalf of the 1.4 million Americans who have joined the Parents Television Council's mission to protect children from graphic sex, violence and profanity in entertainment, the PTC files this formal public comment asking the FCC to reject the transaction referenced above as not being in the public interest.

For more than 15 years, the PTC has correlated an increase in graphic, explicit, violent and profane television content with an increase in the consolidation of media ownership. Perhaps even worse, we have documented an increase in harmful, explicit content being fraudulently rated by conglomerate-owned distributors as appropriate for children to watch. We have documented instances where local television stations were forbidden to preempt network programming when the program content violated the stations' community standards for decency. When local broadcasters are owned by corporate behemoths that are based hundreds, or even thousands, of miles away, the inevitable result is that local, community standards aren't just ignored, they are obliterated.

While we have no reason to believe that Sinclair, specifically, would increase the volume and/or degree of explicit content at times of the day when children are likely to be watching, the PTC vehemently opposes the FCC from adopting a regulatory structure that most assuredly will allow other corporate entities to do so. This review process must not be just about Sinclair; it must contemplate a regulatory structure for any and all other corporate mergers in the future. The PTC joined the Coalition to Save Local Media precisely because of this threat to local community standards.

During the regulatory review period for this business transaction, Sinclair has not only failed to assure Americans that local community standards will be honored and embraced; rather, they have done the latter – most prominently by the now-renowned parroting-recitation of news anchors on the issue of “fake news.” Let us be perfectly clear that we abhor the concept of “fake news” every bit as much as any other conscientious American. In fact we applaud Sinclair for its corporate pledge to reject the production or

dissemination of “fake news.” But the vice-grip-like control over local broadcast outlets’ messaging demonstrates the very determined corporate control of local voices that we eschew.

It is unfortunate that this merger has been used as a political “football” on today’s hyper-partisan regulatory playing field. Liberal Americans are outraged at the notion of a conservative-leaning media company expanding its reach by unheard-of proportions. Conservative Americans rightly and fervently desire a source of news and information that reflects their values, in contradistinction to the tsunami of opposing political viewpoints proffered by most mainstream media outlets. But for this review, the FCC must rise above the partisan noise on both sides, and instead evaluate this transaction purely on its public interest principles and merits.

It was about a decade-and-a-half ago that the PTC’s founder, conservative commentator Brent Bozell, stood shoulder-to-shoulder with a remarkably diverse group of public policy advocates to oppose the loosening of media ownership rules. Surrounded by what may be the strangest of bedfellows in the history of public policy in Washington – the National Organization for Women and Concerned Women for America; the Salvation Army and Common Cause; the National Rifle Association and MoveOn.org – Mr. Bozell offered the following observation: ‘When all these groups are united on the same issue, then one of two things has happened: either the earth has spun off its axis and we have all lost our minds, or there is universal support for a concept.’

Ms. Dortch, that concept was of vital importance then, and it is of even greater importance today. This matter must not be just about Sinclair’s proposed acquisition of Tribune. Rather, this regulatory review must be about the loss of local, public accountability for the use – or abuse – of the public airwaves. If the FCC delivers on its promise to weaken existing media ownership restrictions, and be manifested by approving transactions such as this one; then children and families will become collateral damage as too-big-to-fail media powerhouses fight to become even stronger.

For these and other considerations, the PTC hereby submits its formal and public opposition to the Sinclair-Tribune merger.

Sincerely,



Timothy F. Winter  
President